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August 29, 2019

BY ECF

The Honorable Lois Bloom, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201
Tel: 718-613-2170

Re: Joint Application for an Extension of Time to Respond to Complaint
Francisco Almonte Gomez v. K. Dew Realty Corp.
Case No.: 19-cv-3143-WFK-LB

Dear Judge Bloom:

We are the attorneys for the Defendant in connection with the above-referenced wage and hour action.

We write, with the consent of Plaintiff's counsel, to respectfully request an extension of time for Defendant to respond to the Complaint in light of the parties' agreement to mediate this dispute through private mediation with JAMS. The parties have exchanged settlement proposals and are optimistic that mediation will help facilitate a resolution.

Defendant's deadline to respond to the Complaint is currently September 4, 2019. The parties have scheduled the mediation for December 6, 2019. Accordingly, we respectfully request that Defendant's deadline to respond to the Complaint be extended to December 20, 2019 (i.e., 14 days after the mediation), in the event the parties are unable to resolve this case at mediation.

The parties plan to engage in limited discovery in advance of the mediation. If acceptable to the Court, the parties will submit to Your Honor a joint mediation status report within 45 days of the date of this letter.

Honorable Lois Bloom
August 29, 2019
Page 2 of 2

Thank you, Your Honor, for your consideration in this matter.

Respectfully submitted,



Andrew P. Yacyshyn

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